

Appl. No. 10/808,697
Reply to Office Action of 12/09/2005

Attorney Docket No. WS-106

REMARKS/ARGUMENTS

There are no claim amendments. Claims 1-5, 9-31, 35-36, and 38-44 remain unchanged. Claims 6, 7, 32, 33, and 37 were previously canceled.

The Examiner rejected independent claim 1 under 35 U.S.C. 103(a) as being unpatentable over Nakamura et al. (US Patent Application Publication U.S. 2004/0093309) and in view of Watanabe et al. (US Patent Application Publication U.S. 2001/0042125). The Examiner argued that Nakamura discloses an apparatus, system and method for electronic ticket management and electronic ticket distribution authentication. The Examiner further argued that Nakamura's system includes the following elements:

- A. A ticket database server (111) for managing data concerning electronic tickets, (Nakamura paragraph 0123), which the Examiner considered to be analogous to the Voucher host system of this invention.
- B. A non-contact IC card (1000) as an example of the information storage chip, (Nakamura paragraph 0120), which the Examiner considered analogous to the voucher smart card of this invention.
- C. A portable device on which the information storage chip is mountable including an IC card, portable terminals, cellular telephones, and so on (Nakamura paragraph 0119), which the Examiner considered to be analogous to the mobile communication device of this invention.
- D. A reader 801 that has the function for reading the ID number of the user and the electronic ticket from the storage chip. If the information storage device is a contact IC card, a card reader provided with a card entrance slot and a card exit slot is provided (Nakamura paragraph 0168), which the Examiner considered analogous to the smart card reader/write of this invention.

We would like to point out the following errors in the Examiner's comparisons. According to Nakamura, as shown in FIG. 8, the reader 801 is a component of the store terminal 150 (Nakamura, paragraph 0167 and FIG. 8). Reader 801 is not a component of a mobile communication device, as is the case in the present invention.

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Furthermore, Nakamura's reader 801 has a card slot for receiving a contact IC card. This IC card slot of Nakamura's reader is totally different and irrelevant to the SIM card slot of the mobile communication device of the present invention, and to the fact that the smart card reader/writer module is attached to the mobile communication device via this SIM card slot. In other words, it is well known that a card reader may have a slot for receiving a card. However, in the present invention it is the mobile communication device that has a slot for receiving a SIM card, i.e., a SIM card slot, and this SIM card slot of the mobile communication device is used to attach a card reader/write module to the mobile communication device. The card reader/write module in turn has a slot for receiving any other IC card, such as the voucher smart card of this invention. In the prior art, a card reader is usually attached to a device either via a serial or a parallel interface of the device. The novelty of this invention is in the fact that the card reader is attached to the mobile communication device via the SIM card slot of the mobile communication device.

Accordingly, since Nakamura does not suggest connecting a card reader to a mobile communication device and it does not attach a card reader to the mobile communication device via the SIM slot of the mobile communication device, the rejection over Nakamura alone is overcome.

The Examiner further argues that Watanabe discloses a mobile phone 6 that has a card reader/writer function for processing the IC card 8 (including SIM card) (Watanabe paragraph 0050-0052).

We would like to point out that as shown in FIG. 1 of Watanabe, the IC card 8 (which may be a SIM card) is an external card and may be processed by the card reader function of the mobile phone. Again, this IC card 8 (including a SIM card) is totally irrelevant to the present invention. There is no reference in the entire specification of Watanabe about attaching a card reader to a mobile communication device via a SIM card slot. The so attached card reader in turn has a slot for receiving any other IC card (including a SIM card), such as the voucher smart card of this invention. Since, Watanabe does not attach

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a card reader to the mobile communication device via the SIM slot of the mobile communication device, the rejection over Watanabe alone is overcome.

We would like to point out that even if were to combine Nakamura and Watanabe we will not arrive to the suggestion of attaching a card reader to the mobile communication device via the SIM slot of the mobile communication device.

Neither Nakamura nor Watanabe or any of the other cited prior art documents suggest either alone or in combination a system for generating and storing prepaid electronic vouchers that includes a card reader/writer and a mobile communication device and where the card reader/writer is attached to a SIM card slot of the communication device. This particular configuration has the following two advantages: a) universality in the connectivity of the card reader/writer by connecting it to the SIM card slot, rather than to a parallel or serial port of the communication device; and b) secure authentication through the SIM card module of the communication device.

The same arguments are valid for independent claim 22. Accordingly, it is believed that the 103 (a) rejection of independent claims 1 and 22 over Nakamura and in view of Watanabe is overcome. Claims 2-6 and 8-21 depend upon claim 1 and claims 23-28, 30-32, 34-36, and 38-44 depend upon claim 22. Since claims 1 and 22 are distinguishable from the cited prior art they should also be distinguishable from the cited prior art.

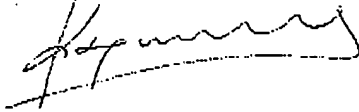
In view of the above, it is submitted that all claims are in condition for allowance. Reconsideration of the rejections and objections is requested and allowance of all claims at an early date is solicited.

If this response is found to be incomplete, or if a telephone conference would otherwise be helpful, please call the undersigned at 617-558-5389

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Respectfully submitted,



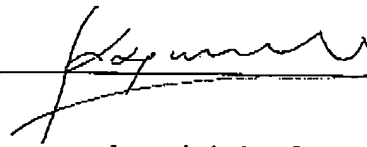
Aliko K. Collins, Ph.D.
Reg. No. 43,558

AKC Patents, 215 Grove Street, Newton, MA 02466
TEL: 617-558-5389, FAX: 617-332-0371

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Date of Deposit 3/8/2006

Name: Aliko K. Collins, Ph.D. Signature



I hereby certify under 37 CFR 1.10 that this correspondence is being faxed on the date indicated above and is addressed to the Commissioner for Patents, P. O. Box 1450, Alexandria, VA 22313-1450